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 CITY AND COUNTY OF SAN FRANCISCO

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

TATYANA LITVINOVA, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

CITY AND COUNTY OF
 SAN FRANCISCO,

Defendant.

Case No. 3:18-CV-01494-RS

**STIPULATION REGARDING CASE
 SCHEDULING AND FILING OF CROSS
 MOTIONS FOR SUMMARY JUDGMENT;
 ORDER AS MODIFIED BY THE COURT**

Complaint Filed: March 8, 2018
 Trial Date: TBD

Pursuant to this Court's direction at the November 18, 2021 Case Management Conference, Defendant City and County of San Francisco (the "City") and Plaintiffs Tatyana Litvinova, et al. hereby submit the below stipulation and proposed order regarding case scheduling and filing of cross-motions for summary judgment. The City and plaintiffs in the related case of *Kristen Silloway, et al. v. City and County of San Francisco*, N.D. Cal. Case No. 3:20-cv-07400-RS are concurrently filing an identical stipulation and proposed order in that case.

The parties agree that all motions for summary judgment will be filed in accordance with a cross-motion briefing schedule, defined below, so Defendant may file a single motion seeking summary judgment in both cases. If Plaintiffs in this case and/or *Silloway* move for summary judgment, Defendant should be permitted to file a consolidated opposition to those motions. Any brief or memorandum of

points and authorities filed by the *Litvinova* plaintiffs in support, opposition, or reply to a motion shall be subject to the page limitations of this Court's Local Rules (25 pages for motions and opposition briefs and 15 pages for reply briefs) unless the parties make a timely request in order to increase the page limitation. Defendant City shall have an increased page limitation due to the fact Defendant will be filing consolidated briefs addressing two cases. Defendant's page limitations for summary judgment briefing shall be 40 pages for motions and opposition briefs and 25 pages for any reply brief, unless the parties make a timely request in order to increase the page limitation.

Additionally, pursuant to the Court's direction to extend all court deadlines by 90 days, the parties submit the below case schedule for approval by the Court. The Court will not approve any further extensions of the non-expert discovery deadlines. Starting with the close of discovery, the case schedule will be as follows:

Feb. 18, 2022	Close of non-expert discovery
Mar. 18, 2022	Deadline to designate expert witnesses, FRCP 26(a)(2)
Apr. 15, 2022	Deadline to designate supplemental and rebuttal experts, FRCP 26(a)(2)
May 6, 2022	Deadline to complete expert discovery, FRCP 26(b)(4)
May 26, 2022	Motions for summary judgment due
June 16, 2022	Summary judgment opposition briefs due
June 30, 2022	Summary judgment reply briefs due
July 14, 2022	Hearing on motions for summary judgment due
July 14, 2022	Deadline to hear all pretrial motions
Aug. 31, 2022	Final Pretrial Conference
Sep. 13, 2022	Trial

The Parties respectfully request that the Court approve the Parties' above stipulation regarding case scheduling and filing of cross-motions for summary judgment.

1 Dated: December 17, 2021

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3 By: /s/Spencer J. Wilson

4 Spencer J. Wilson

5 Attorneys for Defendant

6 CITY AND COUNTY OF SAN FRANCISCO

7 Dated: December 17, 2021

PROMETHEUS PARTNERS

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9 By: /s/Eduardo G. Roy

10 Eduardo G. Roy

11 Attorneys for Plaintiffs

12 TATYANA LITVINOVA, et al.

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15 **ORDER**

16 PURSUANT TO STIPULATION AND THIS COURT'S PRIOR DIRECTION, IT IS SO
17 ORDERED.

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19 Dated: December 17, 2021

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RICHARD SEEBORG

Chief United States District Judge